

Clariant MtG

12/17/83 ~2¹⁰ PM

Erin Russell
John Paul
Michael Teague

> Clariant

Tom Oliver
Kim Tisa
Marlene M. He

> EPA

Tom asked for copy of cover letters & forms sent to customers

- ① Will provide CBZ key for products so can understand and use, & % RBs in end use.
- ② K.T. to ✓ C risk assessments & see when can meet.
Shooting for the beginning of January.
- ③ cover letters & forms ^{from} customers.
- ④ copy of presentation

American Hoechst Corporation

Route 202-206 North • Somerville, New Jersey 08876
Telex 833-449 • Cable Hoechstus, Somerville, N.J.
Telephone (201) 231-2000

Hoechst



Direct dial number: (201)231-2877

NON-CONFIDENTIAL VERSION

May 6, 1985

U.S. Environmental Protection Agency
Document Processing Center
P.O. Box 2070
Rockville, MD 20852

SUBJECT: ADDITIONAL PRODUCTS CONTAINING PCB's AT LEVELS GREATER
THAN TWO MICROGRAMS PER GRAM PER RESOLVABLE GAS CHROMA-
TOGRAPHIC PEAK.

Dear Sir:

American Hoechst Corporation hereby makes an additional report of
PCB's in its products pursuant to 40 CFR 176.185(a).

1. Domestic manufacture of azo-pigments based on a process described
in the confidential version of this report.

Compliance with the requirements of section 761.1(f) is being
insured by actual monitoring of our product and waste streams.
All past and future analysis records and interpretations will be
maintained for the prescribed period.

2. Imported pigments based on the process described in the
confidential version of this report.

Compliance with the requirements of section 761.1(f) will be
assured by continued monitoring. Past analyses and future
records will be maintained for the prescribed period.

I certify under penalty of law that this document and all attach-
ments were prepared under my direction or supervision in accordance
with a system designed to assure that qualified personnel properly
gather and evaluate information. Based on my inquiry of the person
or persons directly responsible for the gathering information, the
information is, to the best of my knowledge and belief, true,
accurate, and complete. I am aware that there are significant U.S.

Rockville, MD 20852

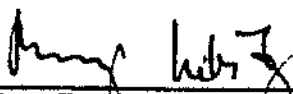
May 6, 1985

PAGE TWO

E.P.A. penalties for falsifying information, including the possibility of fines and imprisonment for knowing violations.

Dated: 5 / 06 / 85

Dated: _____



Dr. H. U. Trebitz
Director, Environmental
Affairs and Product Safety

Mr. H. P. Geiss
Vice President and
General Manager,
Colorants and Auxiliaries

HHT:md

Clariant Corporation
Pigments and Additives

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Erin S. Russell
Senior Counsel



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Michael A. Teague, Ph. D.
Vice President

MTG Clarant 10/14/03

CBI DELETED.

EPA

K. T. Se

C. Smith

M. H. H. H.

Clarant

M. Teague

John Paul

Eric Russell

6-7 mcs facilities US

20-30 total sales.

American Harsco Corporation 1985 production

intermediate final lab testing ok
intermediate like 25% lot single ppm levels
tetrachloro forming #3

Testing final product Sept 2003 → OK

3 industries still to
Teflon, coatings plastics.

Coventry PI facility only is producing this material.
210,000 - 7,000 lbs Mex. 20.

I need to ✓ - returning from Mexico
additional information of process
total site, robot capacity

Template



Clariant

Clariant Corporation is a U.S. affiliate of Clariant Ltd., a Swiss-based global specialty chemical company, which manufactures and markets a wide range of specialty and fine chemicals for the pharmaceutical, agrochemical, electronic, plastics, paints and coatings, textile, paper, leather, metal, household and personal care products and chemical processing industries.

1

October 14, 2003



Evolution of Clariant



2

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Meeting Goals

Begin dialogue with EPA and share information including:

- Clariant Pigment Red 144 and Pigment Red 214 (Red 144/214) manufacturing process at Coventry
- Discovery of PCB contamination in Red 144/214
- Response actions taken to date
- Issues that need to be addressed regarding further actions

3

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Pigment Production

- Pigments based on di- and trichloroanilines have the potential to inadvertently generate PCBs
- Recognized by EPA in TSCA PCB rulemaking
See 48 FR 50486 (1983)
- Excluded manufacturing process filing covers manufacture of di- and trichloroaniline based pigments
- The Red 144/214 processes are part of the notification under 40 CFR 761.185(a) to EPA made by American Hoechst Corporation (now part of Clariant) in 1985

4

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TSCA Confidential Business Information



Clariant Red 144/214 Pigment Manufacture

- These pigments have been made by Clariant at sites outside the United States for 10 years
- CONFIDENTIAL BUSINESS INFORMATION
- CONFIDENTIAL BUSINESS INFORMATION

5

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**Clariant Red 144/214 Pigment Manufacture
Pre-Manufacture Activities**

- Review of production processes used in Europe
- Lab scale production
- Intermediate and lab produced product testing
- Amounts of PCB in intermediate matched amounts of PCB in the finished product
- Conclusion that PCB generation potential is found in the diazotization stage and not the condensation reaction
- Therefore, testing of intermediate appeared to be appropriate control

6

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TSCA Confidential Business Information



Clariant Red 144/214 Pigment Manufacture Basic Process

Confidential Business Information

7

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TSCA Confidential Business Information



Clariant Red 144/214 Pigment Manufacture Historical Data

- Batch process used to create commercial lots of pigments based on color properties
- Confidential Business Information

8

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Pigments and Additives Division Global Quality Initiative

- Program designed to globally coordinate QC and analytical data on products
- Protocol considered international guidelines, (EU, USA, Japan, France, Austria, Australia, Germany, etc)
- Prioritized international products and newly made or introduced products
- Protocol matrix may include metals, primary aromatic amines, aromatic amino sulfonic acid, polychlorinated biphenyls (PCB)
- Red 144/214 testing completed in September 2003

9

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TSCA Confidential Business Information

Clariant Red 144/214 Pigment Analytical Results

Confidential Business Information

10

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Initial Responses

- Production of Red 144/214 stopped and material quarantined
- Occupational health and exposure assessment experts retained and employees informed of results
- Confirmatory sampling and sampling of historical batch retains
- Customers notified and informed of our engagement of Clean Harbors to retrieve product for disposal
- Regulatory notifications - EPA and RIDEM

11

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Regulatory Notifications

EPA Reporting

- Clariant made self-report under audit privilege.
- Initial notification made to Tony Ellis of OECA at EPA Headquarters.
- Matter referred to Geraldine Gardner who was contacted by telephone and with a follow-up letter. After internal EPA consultations, Ms. Gardner recommended that Region 1 would take the lead on this issue to coordinate EPA response.
- Contacted Ms. Deborah Brown and sent copies of prior correspondence with EPA.
- Program questions referred to Peggy Reynolds, also at Headquarters.

12

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Regulatory Notifications (cont.)

RIDEM Reporting

- No mandatory reporting was determined to apply to RIDEM.
- Self-report made for informational purposes to Mr. Jan Reitsma, Director of RIDEM.
- Follow-up letter sent to Mr. Reitsma.

13

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Evaluation of Production Process Issues

Process Development Lab proceeding on 3 paths after we identify source of PCB formation:

- Eliminate by-product that forms free radicals to stop PCB formation, or
- Add free-radical scavenger to stop free radical formation from by-product, or
- Minimize PCB formation, prevent PCBs from remaining in product, concentrate in still bottoms
 - This process is being evaluated for product recovery as well

14

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Regulatory Issues and Open Questions

- Possibility of reprocessing off-spec material
 - 40 CFR 761.60(e)
 - Procedure to obtain EPA approval to reprocess contaminated pigment
 - PCBs will be concentrated in solvent still bottoms and incinerated
- Transport of inventory at Clariant Mexico back to Coventry site for either reprocessing/disposal (40 CFR 761 subpart F)

SARA 313 Reporting

- Coventry Site has submitted Form R's for PCB releases for 2000, 2001, 2002.
- There was not a 313 report for previous years due to de minimis concentrations
- All reported releases were for off-site transfers, based on conservative estimates, not analytical
 - 2000-0.66 pounds
 - 2001-0.82 pounds
 - 2002-0.29 pounds
- Review need for filing amendments

Regulatory Issues and Open Questions (cont.)

Additional reporting

- Submissions going forward
 - Register 214 and 144 process 761.185
 - R and D registration 761.60(j)
- Submissions looking back
 - 761.187(a) 0.0025% of sites rated capacity
 - Total site capacity ~8,000,000 pounds
 - Total site capacity of inadvertent PCB-generating processes ~ 5 million pounds
 - Individual process capacity ~1 million pounds
 - Actual production- varies

DATE: 10/1/03 TIME: 8¹⁰ AM

PERSON CONTACTED: Erin Russell (Legal office 3)

PHONE #: 704-331-7059

LOCATION:

SUBJECT: Claricat

SUMMARY:

Left message for him to call me back, is mtg on Oct 14th
9:00 mtg Boston 10/14/03 OK

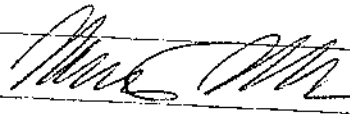
Erin Russell - inhouse counsel.

Mike Teague - VP of Environmental Safety & Health

John Paul - at The Cententry ESTHA Manager.

ACTION

REQUIRED:

SIGNATURE: 

DATE: 9/26/03

TIME: ~ 8¹⁰ AM

PERSON CONTACTED: Geraldine Gardner

PHONE #: 202-564-4032

LOCATION: HQ

SUBJECT: Clarant

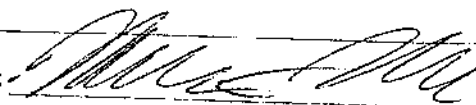
SUMMARY:

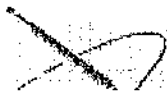
Left message for her to call me back

ACTION

REQUIRED:

SIGNATURE:





FACILITY R1

10/01/03 01:19 PM

To: MARIANNE MILETTE

cc:

Subject: Reservation Confirmation * *

MILETTE, MARIANNE

For Your Information,

You have reserved the Conference Room No.

1103, Narragansett Bay,

(Direction: Main Entrance Hallway)

View map ==>

<http://r1-gis-03.r1.epa.gov:9876/website/floorplan?Layers=001100ActiveLayer=3&Query=Jack='D1407'&QueryZoom=Yes>

with a start date and time of 10/14/2003 9:00am

and an ending date and time of 10/14/2003 12:30pm

If you have any questions or need to modify your reservation,
please contact the Facility Help Desk at 8-2000.

OEME personnel should contact Sylvia Estabrook 8-8332 for changes.

Please contact Chris Diehl 8-1944 for Info Center Training Room changes.

Thank You

Visitor Pre Registration Confirmation

Close Window

Print Confirmation

Thank You, Milette, Marianne for taking the time to pre-register your visitors. The information you have provided has been submitted to the Facilities Help Desk staff. They will coordinate with the building security staff to ensure your visitors badges are ready on the day of your meeting.

Please submit another form if you need to amend the details of this registration information.

Meeting Details

Date: 10/14/2003

Time: 9:00 AM

Visitors: Erin Russell Mike Teague John Paul

Pre-Registration Form Submitted: 10/01/2003 12:45:52 PM